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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2011-1013*

13 **CANDACE LYNN GERONILLA, a.k.a.**  
14 **CANDACE JOHNSON, a.k.a. CANDACE**  
15 **RAMIREZ, a.k.a. CANDACE MURIEL**  
16 **8000 W. Spring Mt. Rd. #1025**  
17 **Las Vegas, NV 89117**  
18 **Registered Nurse License No. 590777**

**A C C U S A T I O N**

Respondent.

19 Complainant alleges:

**PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
22 Consumer Affairs.

23 2. On or about November 5, 2001, the Board of Registered Nursing issued Registered  
24 Nurse License Number 590777 to Candace Lynn Geronilla, also known as Candace Johnson, also  
25 known as Candace Ramirez, also known as Candace Muriel (Respondent). The Registered Nurse  
26 License was in full force and effect at all times relevant to the charges brought in this Accusation  
27 and will expire on October 31, 2011, unless renewed.  
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1 COST RECOVERY

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
3 administrative law judge to direct a licentiate found to have committed a violation or violations of  
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
5 enforcement of the case.

6 FIRST CAUSE FOR DISCIPLINE

7 (Unprofessional Conduct – Out of State Discipline)  
8 (Bus. & Prof. Code §2761, subd. (a)(4))

9 9. Respondent has subjected her registered nurse license to disciplinary action under  
10 Code section 2761, subdivision (a)(4), in that on or about March 26, 2001, in a disciplinary order  
11 issued by the Nevada State Board of Nursing (Nevada Board), the Nevada Board denied  
12 Respondent's application for a license as a registered nurse based on her submission of a  
13 fraudulent application to the Nevada Board.

14 10. The underlying conduct supporting the Nevada Board's disciplinary order is that  
15 Respondent submitted an application for a registered nurse license to the Nevada Board and  
16 answered "no" to the question regarding previous convictions, despite having been previously  
17 convicted of a misdemeanor.

18 SECOND CAUSE FOR DISCIPLINE

19 (Unprofessional Conduct)  
20 (Bus. & Prof. Code §2761, subd. (a))

21 11. Respondent has subjected her registered nurse license to disciplinary action under  
22 Code section 2761, subdivision (a), in that Respondent engaged in unprofessional conduct when  
23 she was employed on a travel assignment with Mercy General Hospital from June 2002 through  
24 October 2002. Specifically, Respondent made fraudulent entries on her travel company timecard  
25 and overbilled Mercy Hospital in excess of \$15,000.00.  
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1. Revoking or suspending Registered Nurse License Number 590777, issued to Candace Lynn Geronilla, also known as Candace Johnson, also known as Candace Ramirez, also known as Candace Muriel;

3. Taking such other and further action as deemed necessary and proper.

DATED: June 29, 2011

*Louise R. Bailey*  
 LOUISE R. BAILEY, M.ED., RN  
 Executive Officer  
 Board of Registered Nursing  
 Department of Consumer Affairs  
 State of California  
*Complainant*

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